



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

APR 20 2016

Mr. Robert Martella
Manager of Operations
Precision Kidd Steel, Inc.
1 Quality Way
Aliquippa, PA 15001

Re: Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and Management of Hazardous Waste by Precision Kidd Steel, Inc.

Information Request - Reference No. C16-016
EPA ID No. PAD061778684

Dear Mr. Martella:

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting information from Precision Kidd Steel, Inc. (herein after "PKSI" or the "Company") to supplement the information obtained by EPA during the inspection of the PKSI facility located in Aliquippa, PA (the "Facility") on September 23, 2014, and to supplement the information provided in your January 26, 2016 letter in response to EPA's information request. EPA is requesting this information pursuant to the authority granted to it under Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes" EPA hereby requires that you furnish to EPA, within thirty (30) calendar days of receipt of this letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each question. Precede each answer with the number of the question or letter of the subpart of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. For each copy of a document produced in response to this request, indicate on such copy, or in some other reasonable manner, the number of the request to which it responds, the current location and custodian of the original, the date such original was

prepared, the person(s) who prepared the original and the date the document became effective at the Facility.

As used herein, the term “document” means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266 and 268 shall have the meanings set forth therein.

Requested Information

1. In your January 26, 2016 information request letter (“IRL”) response to Question 4.a, you provided a list of names for each employee responsible for the handling/management of hazardous waste at the Facility from January 1, 2011 to the present. For the following names, Carl R., John M., Matt M., Dave H., John T., Joe Z., Aaron B., and Matt W., please provide: i) the date (month & year) each employee began working at the Facility, and ii) if any of the employee(s) on the list no longer work at the Facility, indicate the date (month & year) when such employees ended their respective employment.
2. In your January 26, 2016 IRL response to Question 5, you provided copies of hazardous waste manifests from January 2011 to January 2016, which you included as Attachment I. Also included in Attachment I are work orders that document offsite shipments of spent sulfuric acid waste (UN1832) from PKSI to EQ Detroit, Inc. (EPA ID #: MID980991566), and to Enviroline of Ohio, Inc. (EPA ID#: OHD980568992). Based on the information provided in your IRL response, Nineteen (19) offsite shipments of spent sulfuric acid were documented using a work order in 2014, Twelve (12) work order documented shipments were made in 2015, and one (1) work order was used to document a shipment in 2016. For each offsite shipment of spent sulfuric acid that was documented using a work order in calendar year 2014, 2015, and 2016, please provide the following information:
 - a. Provide a detailed description of the process or processes that generated the content of each shipment, provide a detailed description for the content of each shipment, and provide a waste profile for the content of each shipment.
 - b. If a “waste determination” was made for the content of each shipment, state whether the waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.

- c. Was the content of each shipment determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with the content of each shipment that was determined to be hazardous waste.
 - d. State, for each of the offsite shipments generated at the Facility, whether or not any were sent offsite to be reclaimed, recycled or reused. Provide a copy of any and all documentation substantiating such claims of reclamation, recycling, or reuse.
3. In your January 26, 2016 IRL response to Question 6, you provided a copy of the Facility contingency plan that was in effect during the 9/23/14 EPA CEI. State whether or not the Facility maintains a Spill Prevention, Control, and Countermeasures (“SPCC”) Plan that is separate from the Facility’s contingency plan. Provide a copy of the Facility’s SPCC plan that was in effect at the time of the EPA inspection, if applicable.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Your facility is entitled to assert a claim of business confidentiality covering any part or all of the information submitted, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to your facility.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA’s request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____
Name: _____
Title: _____

Please send your response to:

Andrew Ma
US EPA Region III
Environmental Science Center
701 Mapes Road
Fort Meade, MD 20755-5350

If you have any questions concerning this matter, please contact Mr. Andrew Ma at (410) 305-3429.

Sincerely,

A handwritten signature in cursive script that reads "Carol Amend".

Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

cc: A. Ma (3LC70)